

Section 1. Registration Information

Source Identification

Facility Name:	BC Systems
Parent Company #1 Name:	Chiquita Brands
Parent Company #2 Name:	Fresh Express

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Voluntary update (not described by any of the above reasons)
Description:	
Receipt Date:	11-Aug-2010
Postmark Date:	11-Aug-2010
Next Due Date:	11-Aug-2015
Completeness Check Date:	21-Oct-2010
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0016 8481
Other EPA Systems Facility ID:	AZR000000364

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	131627119
Parent Company #1 DUNS:	154483457
Parent Company #2 DUNS:	154483457

Facility Location Address

Street 1:	6581 Cattle Drive
Street 2:	
City:	Yuma
State:	ARIZONA
ZIP:	85365
ZIP4:	
County:	YUMA

Facility Latitude and Longitude

Latitude (decimal):	32.735056
Longitude (decimal):	-114.521139
Lat/Long Method:	Interpolation - Map
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	BC Systems
Operator Phone:	(928) 317-5728

Mailing Address

Operator Street 1:	950 E. Blanco Rd
Operator Street 2:	
Operator City:	Salinas
Operator State:	CALIFORNIA
Operator ZIP:	93901
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Jaime Britt
RMP Title of Person or Position:	Global (EHS) Manager
RMP E-mail Address:	jbritt@chiquita.com

Emergency Contact

Emergency Contact Name:	Trinidad Ramirez
Emergency Contact Title:	Safety Manager
Emergency Contact Phone:	(928) 317-5728
Emergency Contact 24-Hour Phone:	(831) 970-3224
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	TRAMIREZ@CHIQUITA.com

Other Points of Contact

Facility or Parent Company E-mail Address:	jbritt@chiquita.com
Facility Public Contact Phone:	(831) 775-3919
Facility or Parent Company WWW Homepage Address:	www.chiquita.com

Local Emergency Planning Committee

LEPC:	Yuma County LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	113
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	15-Apr-2010
Last Safety Inspection Performed By an External Agency:	Fire Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Jaime Britt
Preparer Phone:	(831) 775-3919
Preparer Street 1:	950 E Blanco Rd
Preparer Street 2:	
Preparer City:	Salinas
Preparer State:	CALIFORNIA
Preparer ZIP:	93901
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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Process Chemicals

Process ID:	1000018474
Description:	Portable Refrigeration
Process Chemical ID:	1000021906
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	23577
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000018474
Process NAICS ID:	1000018800
Program Level:	Program Level 3 process
NAICS Code:	11511
NAICS Description:	Support Activities for Crop Production

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000014614

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000016131

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:
Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:
Flares:
Scrubbers:
Emergency Shutdown:
Other Type:

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000018201
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7

Prevention Program Level 3 ID:	1000015155
NAICS Code:	11511

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	10-Mar-2010
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	10-Mar-2010
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The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-May-2010

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	

Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	Water Diffusion

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:
Installation of Process Controls:
Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended: Yes

None:

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 02-Jan-2010

Training

Training Revision Date (The date of the most recent review or revision of training programs): 01-Jan-2009

The Type of Training Provided

Classroom: Yes

On the Job: Yes

Other Training:

The Type of Competency Testing Used

Written Tests: Yes

Oral Tests:

Demonstration: Yes

Observation: Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 01-Nov-2009

Equipment Inspection Date (The date of the most recent equipment inspection or test): 30-Apr-2010

Equipment Tested (Equipment most recently inspected or tested): Portable Coolers

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 01-Aug-2009

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 02-Oct-2009

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 01-Nov-2009

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 01-Jan-2008

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 01-Feb-2008

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)): 10-Feb-2010

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 01-Mar-2010

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 01-Nov-2009

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 01-Nov-2009

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 01-Nov-2009

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance): 01-Nov-2009

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 01-Dec-2009

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 01-Jul-2009

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): Yuma Fire Department

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (928) 373-4853

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120:

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws: Yes

Other (Specify): 29 CFR 1910.119

Executive Summary

1. Executive Summary

1.1. Accidental Release Prevention Plan and emergency Response

The management of BC Systems is committed to maintaining a safe work environment. A Safety and Risk Manager has been assigned to ensure that safe practices are followed in the specification and operation of systems involving hazardous chemicals. This site has developed and trained an Emergency Response Team to ensure rapid and appropriate response to ammonia emergencies. The site has specific and written evacuation, reporting, and response procedures in place to protect BC Systems employees, the public, and the environment in the event of an ammonia release. Due to the seasonality of this operation, the Yuma, Arizona facility is operational for six months out of the year - from November to April. During the on-season months, there are five portable ammonia refrigeration systems on site and operational, containing a total volume of 20,577 lbs of ammonia. There is an additional 3000 lbs of ammonia stored in a nurse tank. During the off-months (May through October) three of the refrigeration units are transported to an alternate location and the total quantity of ammonia (23,577 lbs) is stored in nurse tanks. One unit remains at Yuma full time, but this is considered portable due to its configuration. The anhydrous ammonia refrigeration units are used for room cooling and process water chilling. This system is depicted on the block flow diagram in Figure 5-1. This ammonia refrigeration system is the only process at this site to which the RMP requirements are applicable.

1.2. Stationary Source and Regulated Substance

The BC Systems plant covered by this RMP is located at 6581 East Cattle Drive, Yuma, Arizona. The facility receives lettuce and other produce to be processed, packaged for consumer use in various salad mixes, set for short-term storage, and transported and distributed from this site.

The regulated substance is anhydrous ammonia. Six portable ammonia refrigeration systems are used for refrigerating produce at various temperatures. The total charge to this refrigeration system is 23,577 pounds of anhydrous ammonia.

1.3. Accidental Release Prevention Program and Chemical Specific Prevention Steps

Prevention of accidental ammonia release at BC Systems is accomplished through the following:

- sound industry practice in the original ammonia refrigeration system design and construction

- specification and review of system modifications

- day-to-day operation and maintenance of the system

Day-to day operation and maintenance includes:

- Compliance with industry standards and codes in effect at the time of initial construction and modification

- Performance of a thorough Process Hazard Analyses (PHAs) at least once every five years using accurate Process Safety Information

- Implementation of Operating Procedures which have been reviewed by PHA

- Appropriate initial and refresher training of system operations and maintenance personnel

- Performance of preventive and corrective maintenance according to system component manufacturer recommendations and pursuant to site wide hazardous energy lockout and hot work permit programs

- Application of established auditing, inspection, and pre-start-up review protocols

- Use of qualified contractors for work on the system

1.4. Five-Year Accident History

Between March 2005 and the present, no ammonia releases resulted in onsite or off-site injuries, deaths, or property damage, or off-site environmental damage, evacuations, or sheltering in place.

However, the following ammonia-related incidents occurred:

11/27/07 • At approximately 23:30, there was a release of an ammonia and compressor oil mixture from the oil return line on the 160 screw compressor for cooler #5. The motor on the compressor suddenly seized, causing a sudden vibration that led to a failure of the oil return line at the threaded fittings. The failure led to the release. During the incident, a total of 35 gallons of oil and ammonia mixture release. The total amount of ammonia released was calculated to be approximately 25 pounds. The incident ended at approximately 01:15.

1.5. Emergency Response Program

BC Systems has developed an Emergency Planning and Response document to ensure adequate preparedness with rapid and appropriate response to ammonia release emergencies. The plan is maintained at the site's Safety Office and reviewed annually. The document describes outside agency notification procedures in the event of an ammonia release, provides detailed evacuation procedures, and includes response procedures for the mitigation of ammonia releases.

The site has an Ammonia Emergency Response Team trained to use the Incident Command System organizational framework. This is also described in detail in the planning document.

1.6. Planned Changes to Improve Safety

Based on the Revalidation Process Hazard Analysis (PHA) conducted on March 10, 2010 the following adjustments are planned to

ensure continued safe operations: